

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

TIFFANY SHARPE, individually, and on behalf
of all other similarly situated individuals
who consent to become Plaintiffs,

Plaintiffs,

v.

Case No. 09 CV 329

APAC CUSTOMER SERVICES, INC.,

Defendant.

**DECLARATION OF GEORGE A. HANSON IN SUPPORT OF PLAINTIFFS' MOTION
AND MEMORANDUM IN SUPPORT OF MOTION FOR APPROVAL OF FLSA
COLLECTIVE ACTION RESOLUTION**

I, George A. Hanson, hereby declare as follows:

1. I am an attorney in the law firm of Stueve Siegel Hanson LLP and Class Counsel in this litigation. I submit this declaration in support of Plaintiffs' Motion and Memorandum in Support of Motion for Approval of FLSA Collective Action Resolution.
2. This resolution follows a significant investment of time and expense by the parties conducting discovery and preparing for trial. The parties have exchanged thousands of pages of documents, answered scores of interrogatories, and deposed the Named Plaintiff and many of the Current Opt-In Plaintiffs as well APAC's corporate representatives.
3. On October 9, 2009, Plaintiffs filed their Motion for Collective Action Certification and on January 11, 2010, the Court granted Plaintiffs' Motion.
4. Prior to issuing notice of the certified collective action, 23 individuals in addition to the Named Plaintiff have consented to join this litigation.

5. Following certification, the parties agreed to stay the case and mediate. The parties selected John Phillips of Husch Blackwell Sanders LLP as their mediator. Mr. Phillips is a nationally-renowned mediator well-versed in complex wage and hour cases. In advance of mediation, the parties exchanged additional information necessary to fully and fairly evaluate the claims of existing and putative class members, including information related to the size of the class, weeks worked by class members, the prevalence of overtime weeks, and class compensation data. The parties participated in a two-day mediation on March 9-10, 2010. Although the parties did not reach an agreement at the close of the mediation, negotiations continued over the next several weeks, and the parties reached a resolution.

6. The release required from the Current Opt-In Plaintiffs and Qualified Claimants to participate in the settlement is limited – not general – in nature. The amounts allocated to each of Current Opt-In Plaintiff and Qualified Claimant constitute consideration solely for the release of their FLSA claims they may have as a Customer Service Representative.

7. Plaintiffs' Counsel executed fee arrangements with the Named Plaintiff and Current Opt-In Plaintiffs that entitle Plaintiffs' Counsel to 35% of any recovery.

8. The proposed settlement brings substantial value to the certified Rule 216(b) class. On average, according to our estimate, after deduction of the requested attorneys' fees and costs, the net settlement will provide a payment that is equivalent to make-whole relief for an average of nearly 10 minutes per day of off-the-clock work for each week in which overtime was worked by the Named Plaintiff, Current Opt-In Plaintiffs, and Potential Opt-In Plaintiffs.

9. Stueve Siegel Hanson LLP has substantial experience in prosecuting large-scale wage and hour class and collective actions such as this, and routinely negotiates contingency fee compensation rates at or near 35%. *See* Stueve Siegel Hanson LLP Firm Resume, attached

hereto as Exhibit 1. Co-counsel, Lear Werts LLP, is also experienced in wage and hour class and collective actions. *See* Lear Werts LLP Firm Resume, attached hereto as Exhibit 2.

10. I have been the lead or co-lead counsel on over 70 wage and hour cases, and have developed substantial experience and expertise in the area of wage and hour law. I am also a frequent speaker regarding wage and hour matters nationwide.

I declare under penalty of perjury that the foregoing is true and correct. Executed this June 7, 2010, at Kansas City, Missouri.



George A. Hanson

EXHIBIT 1

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Representing Corporate and Individual
Plaintiffs Nationwide in Complex Litigation.

Kansas City

460 Nichols Road, Suite 200
Kansas City, Missouri 64112
(816) 714-7100 tel
(816) 714-7101 fax

San Diego

550 West C Street, Suite 610
San Diego, California 92101
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Firm Overview

Stueve Siegel Hanson LLP was founded in 2001 by lawyers who formerly practiced at large national law firms. The Firm now boasts seventeen lawyers between its offices in Kansas City and San Diego. The Firm is rated AV, and its lawyers have accumulated several local, regional, and national awards for their successes and dedication to the practice. Many of our lawyers formerly served as government lawyers or law clerks including several who served on the Eighth Circuit Court of Appeals and the Missouri Supreme Court. Stueve Siegel Hanson represents plaintiffs and defendants in complex business, class action, securities, wage and hour, environmental, and product liability litigation and trials.

Since opening our doors in 2001, Stueve Siegel Hanson has obtained substantial results in a wide range of class and collective actions while serving as lead or co-lead counsel including:

- Obtaining in excess of \$100 million in settlements of wage and hour claims on behalf of employees in the financial services, pharmaceutical, and call center industries;
- Obtaining over \$75 million in relief for purchasers of Hyundai vehicles for Hyundai's overstatement of horsepower in vehicles;
- Obtaining \$35.5 million in settlements from three refiners on behalf of adjacent home owners who were living above a large plume of gasoline leaked from the refineries and connecting pipelines;
- Obtaining over \$35 million in relief for Volkswagen owners affected by VW's use of a faulty plastic part in the window mechanism of certain vehicles;
- Obtaining \$33 million in relief for owners of Mitsubishi and Chrysler owners related to defective wheel rims;
- Obtaining \$25.5 million for purchasers of H&R Block's Express IRA product related to allegedly false representations made during the sales presentation;
- Obtaining a \$7.7 million nationwide settlement after the Court certified a nationwide class of Cable & Wireless customers who had been overcharged PICC fees; and
- Obtaining \$7.2 million in relief for Sprint customers affected by Sprint's practice of improperly charging "casual caller" rates.

In addition to these cases, Stueve Siegel Hanson currently acts as lead or co-lead counsel in class and collective actions pending against AmeriGas, Inc., Ferrellgas Partners, The Dow Chemical Company, Sinclair Oil Company, Wells Fargo Bank, Dell, Kraft, JP Morgan Chase, RJ Reynolds, Sprint/Nextel, Tyson Foods, Merck, Monsanto, AT&T Wireless, Volkswagen, DaimlerChrysler and TeleTech Holdings, Inc.

Stueve Siegel Hanson has also devoted a significant portion of its practice to representation of employees in large wage and hour class and collective actions in various industries. Stueve Siegel Hanson has prosecuted over 70 such wage and hour class and collective actions throughout the country. Stueve Siegel Hanson is also currently serving as

co-lead counsel against Wells Fargo Bank in two different MDL actions of consolidated wage and hour cases.

Additionally, Stueve Siegel Hanson has handled a wide variety of class and individual securities fraud and antitrust cases. Currently, Stueve Siegel Hanson is acting as lead counsel in a number of cases alleging violation of the securities laws in connection with the collapse of the \$330 billion auction rate securities market. Stueve Siegel Hanson has been named lead counsel under the PSLRA in such cases against JP Morgan Chase, Oppenheimer, E*Trade, UBS, Wachovia, and Deutsche Bank. Stueve Siegel Hanson has also been named co-lead counsel in Aftermarket Automotive Lighting Products Antitrust Litigation.

A Trial Firm

Stueve Siegel Hanson also prides itself in obtaining substantial results in non-class cases, including numerous successes at trial. Some of our recent courtroom victories include:

- A \$24 million jury verdict on behalf of independent contractor agents against State Farm in a breach of contract and tortious interference case;
- A \$4.2 million jury verdict against one of the country's largest securities brokers, A.G. Edwards & Sons, in a breach of contract and fraud case;
- A \$3.5 million jury verdict and attorneys' fee award against the world's largest manufacturer of recreational boats in a fraud and breach of contract case;
- A \$1.6 million jury verdict against a major paint and coating supplier in a negligent misrepresentation case;
- A \$660,000 verdict in a trademark and licensing infringement case.
- A defense verdict for a client defending a multi-million dollar tort claim; and
- A defense verdict in a high-profile white collar criminal price fixing case following an eight week trial.

Representative Cases

Consumer Fraud

Powers Law Offices, P.C. v. Cable and Wireless USA, Inc., Case No. 99-CV- 12007 EFH, United State District Court for the District of Massachusetts (consumer fraud case alleging Cable & Wireless overcharged PICC fees by Cable & Wireless; \$7.7 million settlement approved).

Sadowski v. General Motors Corp., Case No. HG03091369, Superior Court for Alameda County, California (consumer protection case alleging that Dex-Cool degraded certain vehicles' intake manifold gaskets and other engine salability components, and that in certain other vehicles, Dex-Cool formed a rusty sludge, clogging the vehicles' cooling systems and causing vehicles to overheat; substantial monetary settlement approved in March 2008.)

In Re: H&R Block, Inc. Express IRA Marketing Litigation, Case No. 4:06-md-01786-RED, United States District Court for the Western District of Missouri (consumer protection case alleging H&R Block improperly marketed and sold its Express IRA product; \$25.4 million class settlement approved May 2010).

Hyundai Horsepower Litigation, Case No. 02CC00303, Superior Court for Orange County, California (consumer claims alleging Hyundai overstated horsepower ratings in more than 1 million vehicles sold in the United States over a 10 year period; settlement approved valued at between \$75-\$125 million).

Parkinson v. Hyundai Motor America, Case No. 8:06-cv-345-AHS, United States District Court for the Central District of California (consumer protection case alleging Hyundai knowingly sold vehicles with defective flywheel systems; class settlement for reimbursement of repair expenses approved in April 2010).

Tadken v. Mitsubishi Motor Sales of America, Daily v. Daimler Chrysler Motors Corp., Case No. 03CC00484, Circuit Court of Jackson County, Missouri (consumer protection case alleging Mitsubishi and Chrysler sold defective 17 inch rims installed on approximately 350,000 Daimler/Chrysler Avenger and Sebring Coupes and Mitsubishi Eclipse and Eclipse Spyder vehicles; approved settlement valued at \$33 million).

Cromwell v. Sprint Communications Co., LP, Case No. 99-2125, United States District Court for the District of Kansas (consumer fraud case alleging Sprint improperly charged casual caller rates for “direct-dialed” long-distance calls; \$7.2 million settlement approved).

In Re: Underfilled Propane Litigation, Case No. 4:09-md-02086-GAF, United States District Court for the Western District of Missouri (MDL consumer protection case alleging Ferrellgas and AmeriGas conspired to reduce the fill levels of retail propane tanks; \$9 million class settlement with AmeriGas approved in April 2010; litigation pending against Ferrellgas).

Lewin v. Volkswagen of America, Inc., Case No. L-3562-02, Superior Court of New Jersey, Atlantic County (consumer case against Volkswagen for defective window regulators installed on nearly 1 million vehicles; the value of the settlement including the replacement costs and extended warranty could exceed \$50 million).

Environmental

Henry, et al., v. The Dow Chemical Co., Case No. 03-47775-NZ, in the Circuit Court for Saginaw County, Michigan (environmental litigation case alleging Dow Chemical contaminated the Tittabawassee River in Saginaw County, Michigan lowering property values and interfering with the use and enjoyment of property; case pending).

Hopkins v. Premcor, et al., Case No. 03-L-1053, Circuit Court of Madison County, Illinois (environmental class action litigation alleging several refiners caused a four-million-gallon underground gasoline plume in Hartford, Illinois; \$35.5 million settlement approved).

Unpaid Wages/FLSA

Qualls v. Sanofi-Aventis, Case No. 06-0435-CV-W-REL, United States District Court for the Western District of Missouri (FLSA case alleging Sanofi-Aventis failed to pay manufacturing and packaging operators for work duties pre- and post-shift; confidential settlement reached in 2006).

Carson v. Bank of Blue Valley, Inc., Case No. 04-2507-CM, United States District Court District of Kansas (FLSA case seeking unpaid overtime pay on behalf of loan originators; settlement of more than \$1 million reached in November 2005).

McLean v. CenturyTel, et al., Case No. 3:08CV0865, United States District Court for the Western District of Louisiana (FLSA case alleging CenturyTel denied wages and overtime pay to its telephone-dedicated employees working in its call center facilities; confidential settlement reached in July 2009).

West v. First Franklin Financial Corp., Case No. 06-2064-KHV/JPO, United States District Court District of Kansas (FLSA and California Rule 23 case against First Franklin Corporation on behalf of loan account managers for unpaid wages; settlement of \$7.7 million reached in 2007).

Carrell, et al. v. Gateway, Inc., Case No. 02-964-CV-W-DW, United States District Court for the Western District of Missouri (FLSA case against Gateway Computer that alleged Gateway failed to pay overtime to certain call center employees; confidential settlement was reached in January 2004).

Stefaniak, et al. v. HSBC Bank USA Inc., Case No. 05 CV 6528, United States District Court for the Southern District of New York (FLSA and New York state law Rule 23 case alleging HSBC Bank was not compensating workers for the full amount of time spent on the job; \$2.9 million settlement approved in July 2008).

Teeter v. NCR Corporation, Case No. EDCV08-D0297, United States District Court for the Central District of California (FLSA and California Rule 23 case for NCR's failure to accurately record all time worked and failure to pay earned wages and provide uninterrupted meal breaks to its customer engineers; settlement was reached in February 2009).

Perry v. National City, Case No. 05-cv-891-DRH, United States District Court for the Southern District of Illinois (FLSA case representing current and former loan officers employed by National City Bank for unpaid overtime wages; settlement reached for \$27.5 million in 2007).

Brown, et al. v. National Bank of Kansas City, Case No. 04-2510-CM/JPO, United States District Court District of Kansas (FLSA case representing loan originators employed by National Bank of Kansas City for unpaid overtime; confidential settlement approved in January 2006).

Davis, et al. v. Novastar Mortgage, Inc. Case No. 04-0956-CV-W-FJG, United States District Court for the Western District of Missouri (FLSA case against NovaStar Mortgage Company on behalf of loan officers for unpaid wages; court-approved settlement was reached in 2006).

Johns v. Panera Bread Company et al., Case No. 4:08CV1105 (JCH), United States District Court for the Eastern District of Missouri Eastern Division (FLSA case alleged Panera failed to pay its managerial employees for all overtime worked; settlement reached in February 2009).

Horn, et al. v. Principal Financial Group, et al., Case No. 2:05-cv-2032 KHV-DJW, United States District Court District of Kansas (FLSA collection action against the Principal Residential Mortgage that alleged the bank failed to pay overtime to mortgage loan originators; a confidential settlement was reached in 2005).

Garner v. Regis Corporation, Case No. 03-5037-CV-SW-SWH, United States District Court for the Western District of Missouri (FLSA case on behalf of approximately 1,300 current and former salon managers and stylists in a certified wage and hour collective action against Regis Corporation; Court-approved confidential settlement was reached in June 2006).

Bruner, et al. v. Sprint Nextel Corporation et al., Case No. 07-cv-2164 KHV, United States District Court District of Kansas (FLSA collective action against Sprint seeking unpaid wages and overtime on behalf of call center representatives; settlement was approved in 2009).

Hernandez, et al. v. Texas Capital Bank, N.A., Case No. 07-00726-CV-W-ODS, United States District Court for the Western District of Missouri (FLSA case against Texas Capital Bank on behalf of loan officers and branch managers to recover unpaid wages and overtime pay; case was settled in 2008).

Wells Fargo Overtime Litigation. Lead counsel representing a class of loan originator plaintiffs in multidistrict wage and hour litigation consolidated in the Northern District of California. *In Re Wells Fargo Home Mortgage Overtime Litigation*, Case No. 06-1770-MHP. Also, lead counsel in separate multi-district wage and hour litigation also pending in the Northern District of California involving a putative class of Wells Fargo loan processors. *In Re Wells Fargo Loan Processor Overtime Pay Litigation*, Case No. 1841 (MHP).

Securities Litigation

SSH has also been designated lead counsel in several cases alleging securities fraud in connection with the sale of auction rate securities by a number of major broker-dealers including:

Bondar v. Bank of America, Case No. 3:08-cv-02599-JSW, United States District Court for the Northern District of California.

Kraemer v. Deutsche Bank, Case No. 08-cv-2788, United States District Court for the Southern District of New York.

*Oughtred v. E*Trade*, Case No. 1:08-cv-3295 (SHS), United States District Court for the Southern District of New York.

O'Gara v. JP Morgan Chase, Case No. 09-CIV-6199, United States District Court for the Southern District of New York.

In re: Merrill Lynch Auction Rate Securities Litigation, Case No. 08-cv-3037 (LAP), United States District Court for the Southern District of New York.

Jamail v. Morgan Stanley, Case No. 08-cv-3178 (AKH), United States District Court for the Southern District of New York.

Aimis Art Corp., v. Northern Trust, Case No. 08-cv-8057, United States District Court for the Southern District of New York.

Vining v. Oppenheimer, Case No. 08-cv-4435, United States District Court for the Southern District of New York.

Defer v. Raymond James, Case No. 1:08-cv-3449 (LAK), United States District Court for the Southern District of New York.

Brigham v. Royal Bank of Canada, Case No. 08-CV-4431, United States District Court for the Southern District of New York.

Merrick v. Stifel, Case No. 4:08-cv-01167-HEA, United States District Court for the Eastern District of Missouri.

Humphrys v. TD Ameritrade, Case No. 08-cv-2912, United States District Court for the Southern District of New York.

In re: UBS Action Rate Securities Litigation, Case No. 08-cv-2967 (LMM), United States District Court for the Southern District of New York.

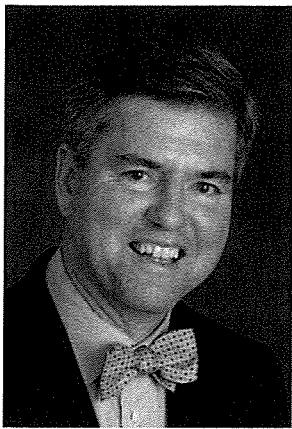
Waldman v. Wachovia, Case No. 08-cv-02913, United States District Court for the Southern District of New York.

Van Dyke v. Wells Fargo; Case No. 3:08-cv-01962-JSW, United States District Court for the Northern District of California.

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We are proud of our successes and our focus on results. Our mission is the same whether our clients are a class of employees and consumers or Fortune 100 companies. More information about our commitment to results can be found on our website: www.stuevesiegel.com.

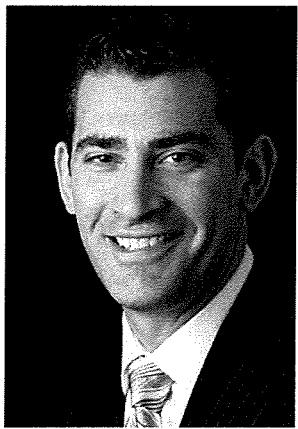
Our Lawyers



Patrick J. Stueve clerked for United States District Court Judge John W. Oliver in the Western District of Missouri, Kansas City. He then joined the trial department of Stinson, Mag & Fizzell and became partner in 1994. He left Stinson in 1996 to found Berkowitz, Feldmiller, Stanton, Brandt, Williams & Stueve. Patrick had various management responsibilities at these firms before leaving to found Stueve Siegel in 2001. Pat received his B.A. in Economics, with distinction, from Benedictine College in 1984, and his J.D. from the University of Kansas (*Order of the Coif*) in 1987, serving as an Editor of the *Kansas Law Review* and the *Criminal Justice Review*.

Patrick has served as lead trial and class counsel successfully prosecuting multi-million dollar claims in federal and state courts nationwide (and AAA arbitrations) in the areas of antitrust, trademark and patent infringement, class actions, securities fraud, telecommunications, franchise, and health care. Pat has been elected by his peers as one of the Top 100 “Super Lawyers” in all of Missouri, and Kansas and repeatedly named “Best of the Bar” by the *Kansas City Business Journal*.

* * *



Norman E. Siegel started his career as a Missouri Assistant Attorney General. Norm later joined Sonnenschein Nath & Rosenthal and was promoted to partner in 2000. Norm received a degree from Tufts University, and his J.D. from Washington University in St. Louis where he was Articles Editor of the *Journal of Urban and Contemporary Law*.

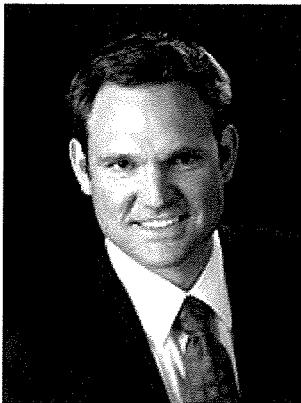
Norm has been named lead counsel in numerous class actions pending around the country including most recently in PSLRA securities litigation against major banks related to the collapse of the auction rate securities market. Norm also has extensive experience as lead counsel in other types of cases pending in courts around the country, has been repeatedly been named “Best of the Bar” and a “Super Lawyer,” and was recently named one the 500 Leading Plaintiff Lawyers in America by *Lawdragon* Magazine. Norm has tried several jury trials to verdict, including a \$24 million verdict for clients in a fraud case and a defense verdict for a client in a criminal price-fixing case. Norm serves on the Metropolitan Bar Foundation and currently serves as Chair of the Healthcare Foundation of Greater Kansas City.

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Our Lawyers



George A. Hanson started his career with Blackwell Sanders in the Labor and Employment Department. He was elected partner in 1999. George served as Chair of Blackwell's Hiring Committee in 2001. George received his B.A. from Oberlin College, with high honors, in 1988, and his J.D. from the University of Minnesota, *cum laude*, in 1992. George has repeatedly been named "Best of the Bar" by the *Kansas City Business Journal*. In 2006, George was selected by his peers as a "Super Lawyer" for Missouri and Kansas. George is also rated AV - the highest designation a lawyer can achieve from publisher Martindale-Hubbell.

George's practice currently focuses on the representation of employees in large wage and hour class and collective actions, including workers in the financial services, meat processing, pharmaceutical and call center industries. In the past five years, George has been lead or co-lead counsel on over 70 wage and hour actions. To date, these wage and hour cases have obtained relief in excess of \$100 million on behalf of firm clients.

* * *



Todd M. McGuire was born and raised in Elgin, Illinois. In 1996, Todd received his B.A. in Rhetoric and Communications Studies from Drake University, *summa cum laude*, where he was a member of Phi Beta Kappa. In 1999, Todd obtained his J.D., with highest honors, from Drake. Todd served as Editor in Chief of the *Drake Law Review* and was a member of the Order of the Coif.

After graduating from law school, Todd began his legal career in the litigation department at Sonnenschein Nath & Rosenthal, specializing in antitrust, white collar criminal defense and commercial litigation. In October 2001, Todd joined Stueve Siegel Hanson LLP and in January 2005, Todd was elected to the Firm's partnership. Todd primarily works in the areas of antitrust, RICO, environmental contamination, and business torts.

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Todd E. Hilton received his B.A. in English and Philosophy, cum laude, from the University of Miami in 1996, where he was President of the International Philosophy Honor Society and Vice President of the International English Honor Society. He received his J.D., with honors, from George Washington University in 1999. Todd was a member of The George Washington Journal of International Law and Economics.

Todd joined Lathrop & Gage out of law school where he specialized in products liability, personal injury, wrongful death, and consumer protection litigation. Todd joined Stueve Siegel in 2002 and was named partner in 2006. He continues to focus his practice on the firm's consumer protection litigation.

* * *



Rachel E. Schwartz received her B.A. with honors in Political Science, Economics and American Studies from the University of Kansas in 1998. In 2001, Rachel obtained her J.D. from the University of Michigan Law School, where she served on the University of Michigan Journal of Law Review. After graduating from law school, Rachel began her legal career in the Dallas, Texas office of Gardere Wynne Sewell LLP on the complex litigation trial team, specializing in antitrust, securities, RICO and other business litigation. In 2004, Rachel joined Stueve Siegel Hanson and was named a partner in 2008.

Rachel has successfully represented a variety of clients in complex civil matters at both the district court and appellate levels. She has both defended and prosecuted claims in the areas of securities, antitrust, RICO, business torts, employment law, intellectual property and contract disputes.

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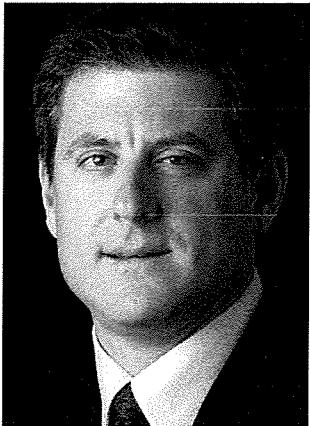
Our Lawyers



Virginia Crimmins graduated from Georgetown University Law School in 2001 and began practicing law at Spencer Fane Britt and Browne where her practice focused primarily on defending business in commercial litigation. Ginnie joined Stueve Siegel Hanson in 2005 and was elected partner in 2008. Ginnie represents both individual and corporate clients in many different forums and has experience prosecuting and defending cases at both the trial court and appellate court levels. Ginnie has also served as co-lead counsel on numerous FLSA collective and class wage and hour cases.

Ginnie is licensed to practice law in Missouri, Kansas and Illinois and is a member of the ABA, Lawyers Association of Kansas City, KCMBBA, KBA, Illinois Bar Association and the Association for Women Lawyers of Greater Kansas City. Ginnie currently serves as the President of the KBA's Employment Law Section.

* * *



Richard Paul began his legal career as a judicial law clerk at the Missouri Supreme Court and the Missouri Court of Appeals, Western District. In 1996, he began private practice with Shughart Thomson & Kilroy, and was elected a Shareholder and Director in 2002. In 2008, Rick moved his practice to Stueve Siegel Hanson. Rick has tried several cases, and has argued more than 40 appeals before a variety of appellate courts across the country.

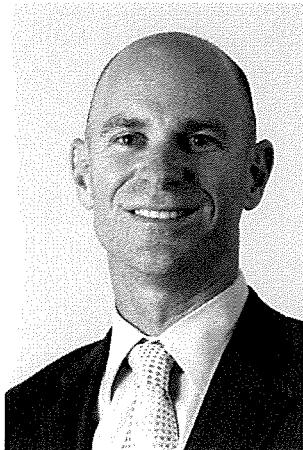
Rick handles a range of cases, including constitutional litigation, intellectual property, antitrust, franchise, oil and gas litigation, employment disputes, bankruptcy litigation, product liability, transportation law, and officer and director liability. Rick has also spent a significant portion of his practice representing bankruptcy trustees as court-appointed Trial Counsel in complex litigation and has also served as Lead or Co-Lead Class Counsel in various class actions.

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Jason Hartley is a 1997 *cum laude* graduate of Tulane Law School and a former partner at Troutman Sanders LLP and Ross Dixon & Bell, LLP. Jason left Troutman Sanders in 2009 to open Stueve Siegel Hanson's San Diego office.

Jason's practice includes class action litigation, antitrust and unfair competition, and music law. He is involved in all aspects of civil litigation and has handled cases in both federal and state courts, in litigation and at trial. For the past several years, his practice has involved primarily antitrust and consumer class actions, often representing the largest plaintiff class members in nationwide antitrust actions. Jason is currently co-lead counsel in *In re Aftermarket Automotive Lighting Products Antitrust Litigation*.

* * *



Eric Dirks began his career as an associate at Shook, Hardy & Bacon where Eric represented well-known corporate clients in the areas of products liability, class actions and complex litigation. Eric joined Stueve Siegel Hanson in 2005 where he now spends his time representing consumers, workers, retirees and businesses. Eric's litigation practice includes class actions, products liability, wage and hour, and commercial litigation.

Eric attended the University of Kansas and received his B.A. in English in 1999. Before college, Eric enlisted in the United States Army Reserves where he was a medic and went on to obtain the rank of Sergeant. Eric then attended the University of Iowa for law school where he received his J.D., with high distinction and was elected to the Order of the Coif.

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Lee Anderson is a 2005 graduate of the University of Missouri at Kansas City, College of Law (magna cum laude) where he served on the Law Review, receiving the Candler S. Rogers Award for the best legal writing submitted to the Law Review. He was elected to the Order of Barristers and served on both the Moot Court Board and the National Trial Team.

He received his Bachelor's and Master's degrees in philosophy and English from the University of South Dakota in 1995 and 1997, respectively. Prior to law school, Lee was Assistant Vice President and Electronic Banking Manager for Citizens Bank & Trust. Before joining the firm, he served as a judicial clerk for the Honorable Ronald R. Holliger, Missouri Court of Appeals.

* * *



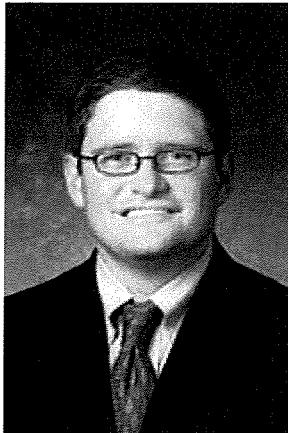
Ashlea Schwarz graduated from Kansas State University, summa cum laude, in 2004, with a B.A. in Mass Communications and German. While at K-State, Ashlea was a member of Phi Beta Kappa, Phi Kappa Phi, and Golden Key. She received her J.D. from the University of Kansas in 2007. Ashlea was awarded the James P. Mize Award for Trial Advocacy and the Robert F. Bennett Award for Public Service upon graduation. She clerked for the Honorable Judge Julie Robinson, United States District Judge for the District of Kansas from 2005-2006.

Prior to joining the firm, Ashlea was an associate at the Miller Law Firm in Kansas City, Missouri, practicing in construction and commercial litigation. She is a member of the LAKC, KCMBA, and the Missouri Bar Association.

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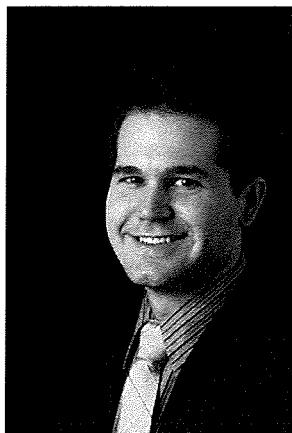
Our Lawyers



Jack McInnes received both his undergraduate and law degrees from the University of Kansas. At law school, he was elected to the Order of the Coif. He also won an award for outstanding legal writing. Jack began his legal career at Slagle, Bernard & Gorman, P.C., where he was a member of the firm's litigation section. At Slagle, he gained substantial experience defending clients in business disputes, personal injury and products liability cases, and employment matters. Jack then moved to Shughart, Thomson & Kilroy P.C. (now Polsinelli Shughart), where he practiced in the firm's business litigation and contingency fee departments.

At Shughart, he found his calling representing plaintiffs in a variety of substantive legal areas, including labor and employment matters, products liability cases, and breach of fiduciary duty claims. In November 2008, Jack joined Stueve Siegel Hanson, where he continues his practice of representing plaintiffs in wage and hour, products liability, commercial and bankruptcy litigation.

* * *



Bradley Wilders began his professional career as a law clerk for the Honorable John R. Gibson of the United States Court of Appeals for the Eighth Circuit. Brad had the rare opportunity to work on cases in five of the eleven federal circuit courts of appeals, including the First, Second, Sixth, Eighth, and Ninth.

Following his clerkship, Brad was an associate with the law firm Sidley Austin LLP in Chicago, Illinois. At Sidley, he practiced intellectual property litigation, where he defended one of the world's largest computer companies against multiple accusations of patent infringement. His cases included both software and hardware patent claims. Brad joined Stueve Siegel Hanson as an associate in 2009 where he will continue representing the rights of inventors whose patents are being infringed.

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Our Lawyers



Lynnette Siegel graduated from the University of Missouri-Kansas City with a B.S. in Biology and a minor in Chemistry. She received her J.D., with distinction, from the University of Missouri-Kansas City law school in 2002. During law school, Lynnette served as Managing Editor of the UMKC Law Review and co-authored the Fall 2000 Freilich Report for *The Urban Lawyer*. She primarily practices in wage and hour litigation representing employees in unpaid overtime and minimum wage cases.

Prior to joining the firm, Lynnette was an associate at Sonnenschein Nath & Rosenthal, LLP, practicing in such diverse areas as general litigation, products liability, NASD broker-dealer regulation, and securities regulation. She is a member of the Missouri Bar Association, and a veteran of the United States Air Force.

* * *



Jason Lindner is a 2000 graduate of the University of Pennsylvania Law School. Jason's practice includes antitrust, unfair competition, complex business litigation, and general class action litigation. He has been involved in all aspects of civil litigation in both federal and state courts, and offices in Stueve Siegel Hanson's San Diego office.

Jason has successfully represented plaintiffs in federal Section 1 (conspiracy) and Section 2 (monopoly) Sherman Act cases and in state law actions alleging unfair business practices. He has served as lead counsel and in senior litigation roles in numerous class actions, which have collectively recovered more than \$1 billion for plaintiffs.

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Barrett Vahle graduated *cum laude* from the University of Missouri – Columbia School of Law, where he was Editor-in-Chief of the *Missouri Law Review*, and received the Judge Shepard Barclay Prize for the graduating law student “who has attained the highest standing in scholarship and moral leadership.” After law school, Barrett was a law clerk for the Honorable Duane Benton of the United States Court of Appeals for the Eighth Circuit, and then for Judge Dean Whipple of the United States District Court for the Western District of Missouri.

Before joining Stueve Siegel Hanson in 2009, Barrett practiced at Sonnenschein Nath & Rosenthal LLP in Kansas City. At Sonnenschein, Barrett concentrated his practice in business litigation, white collar criminal defense, and appellate practice. He was the second chair trial lawyer in a two-week federal mortgage fraud jury trial. Both of his clients were acquitted.

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EXHIBIT 2

LearWerts LLP

FIRM DOSSIER OF WAGE AND HOUR MATTERS

PRIOR COLLECTIVE AND CLASS ACTIONS

McClean v. CenturyTel et al., Case No. 3:08-cv-00865 (E.D. La.)

Lear Werts was co-lead counsel in a nationwide Fair Labor Standards Act ("FLSA") case where the firm represented a collective of approximately 2,800 call center workers. The case was resolved through a court-approved class-wide settlement.

Schleipfer v. Mitek, Inc., Case No. 1:06-cv-00109 (E.D. Mo.)

Lear Werts was lead counsel in a nationwide collective action alleging that the defendant improperly misclassified certain categories of employees as exempt from the FLSA. In a case of first impression in the U.S. District Court for the Eastern District of Missouri, Lear Werts obtained conditional certification for a collective of approximately 350 employees. After protracted litigation, the parties reached a confidential settlement.

PENDING COLLECTIVE AND CLASS ACTIONS

Sharpe v. APAC Customer Services, Inc., Case No. 3:09-cv-00329 (W.D. Wis.)

Lear Werts is co-lead counsel in this nationwide wage and hour case involving approximately 17,000 call center workers. In early January, 2010, the Court issued an order conditionally certifying the case as a collective action. This case is currently stayed to allow the parties to explore settlement.

Stephenson v. Information Providers, Inc., Case No. 0:08-cv-04619 (D. Minn.)

Lear Werts is co-lead counsel in this putative nationwide wage and hour case. This challenges the defendant's classification of certain employees as exempt from the overtime requirements of the FLSA. Plaintiffs obtained an order granting partial summary judgment on the issue of liability and secured a ruling that the case should proceed as a collective action. The case is currently in discovery pending a trial.

Oddson v. Swift, Inc., Case No. 1:09-cv-03034 (D. Colo.)

Lear Werts is co-lead counsel in this putative nationwide wage and hour case. This recently-filed case again challenges the defendant's classification of certain employees as exempt from the overtime requirements of the FLSA. The parties are in the process of seeking court-approval of a class-wide settlement.

Petroski, et al. v. H&R Block, Inc., et al, Case No. 4:10-cv-00075 (W.D. Mo.)

Lear Werts is co-lead counsel in this putative nationwide FLSA case challenging the defendant's policy of requiring its tax professionals to attend unpaid training.

Rumble, et al. v. Ted's Trash Service, Inc., Case No. 0916-CV03051 (Cir. Ct. of Jackson County, Missouri)

Lear Werts is lead counsel in this Missouri Minimum Wage Law case challenging the defendant's classification of certain employees as exempt from Missouri's overtime requirements. The court has preliminarily approved a confidential settlement of this case which is awaiting final approval.

PRIOR INDIVIDUAL ACTIONS

Studeny et al. v. Phelps County, Case No. 4:09-cv-00681 (E.D. Mo.)

Lear Werts represented two K-9 officers who were formerly employed as deputies with the Phelps County, Missouri Sheriff's office. This case alleged that the officers were not properly compensated for all time spent caring for and training their K-9 partners. The case was resolved through a court-approved settlement.

Onwulata v. Stoney Creek Inn, Case No. 2:06-cv-04152 (W.D. Mo.)

Lear Werts represented a housekeeper who worked for a regional hotel chain. The plaintiff alleged that she was not paid for all of the time she spent working on preliminary and postliminary indispensible tasks. The case was resolved through a confidential settlement.

Bradford B. Lear

Brad Lear's practice primarily involves representing individuals and small businesses in lawsuits filed in various state and federal courts. He focuses on complex injury and employment cases – including representing groups of employees in collective and class actions. Brad strives to master the important details of each of his cases while maintaining a "big picture" point of view that allows him to seek and obtain positive resolution of the issues facing his clients.

Brad has successfully represented clients in cases involving wage and hour disputes – including claims under the FLSA for unpaid overtime – and other employment matters including claims of gender, racial, religious, and disability discrimination. Brad also maintains a robust injury and insurance law practice, handling cases involving serious injury and wrongful death claims as well as claims for vexatious refusal to pay insurance proceeds due under life, accident, and long-term care insurance.

Brad is an active member of several professional and charitable organizations where he enjoys participating in community service work – particularly that involving educating young people.

Publications & Speaking Engagements

Missouri Employment Law Institute, Wage & Hour Update (2008)

University of Missouri School of Law, Law Practice Management (2008)

MOBAR CLE: CONTRACTS, Contract Interpretation (2007)

University of Missouri School of Law, Securities Arbitration (2003)

In the Media

Judge qualifies suit as possible class action, St. Louis Daily Record (Sept. 5, 2007)

Cons of Columbia, VOX Magazine (Nov. 29, 2007)

Making the Case for Dispute Resolution, Columbia Daily Tribune (Nov. 29, 2003)

Hickman Students Ready for National Law Debate Contest, Columbia Daily Tribune (May 7, 2009)

Admitted to Practice

Missouri State Courts

Illinois State Courts

U.S. District Court – Eastern District of Missouri

U.S. District Court – Western District of Missouri

U.S. District Court – District of Colorado

Bradford B. Lear, cont'd

Education

University of Missouri – Columbia, J.D.

Missouri Law Review

Order of the Coif

Order of Barristers

Professional Associations

American Bar Association

Litigation Section

Tort Trial & Insurance Practice Section

Missouri Bar Association

Federal Practice Subcommittee

Missouri Association of Trial Attorneys

Emergency Disaster Response Team

Community Involvement

Missouri Boys State

Board of Directors

Dean of Law School

Hickman High School Mock Trial Team

Coach – 2004 to 2009

National Champion, 2008 American Mock Trial Invitational

Missouri State Champion, 2009

Todd C. Werts

Todd Werts' practice primarily involves representing individuals in claims filed in state and federal courts as well as various administrative agencies. He focuses on personal injury and employment cases. Todd works closely with each of his clients to tailor a resolution that meets that specific client's unique needs. Todd also is mindful that individuals may not be aware of the various legal implications of their situation and, therefore, meets individually with each prospective client to listen to their story and present a clear explanation of the client's options.

Todd is a frequent speaker on injury and employment law issues. He is an active member of the Missouri Bar and the Boone County Bar Association where he serves on a number of committees.

Publications & Speaking Engagements

Compensation Issues Under FLSA/Wage and Hour Laws (2009)

ADA Update (2009)

Annual Workers' Compensation Institute: Healthcare Provider Applications for Direct Payment (2009)

University of Missouri School of Law, Law Practice Management (2007-2008)

Nuts and Bolts of Missouri Practice, Employment Termination in Missouri (2007)

MOBAR CLE: CONTRACTS, Contract Interpretation (2007)

In the Media

Sales Contracts, Missouri Bar SoundByte (June 20, 2008)

New Online Complaint Form [for the Missouri Human Rights Commission], KOMU TV-8 (Oct. 23, 2007)

New Clinic Aims to Aid Workers with Injuries, Columbia Daily Tribune (Mar. 3, 2006)

Admitted to Practice

Missouri State Courts

Kansas State Courts

U.S. District Court – Western District of Missouri

U.S. District Court – Eastern District of Missouri

U.S. District Court – District of Kansas

U.S. District Court – District of Colorado

Todd C. Werts, cont'd

Education

University of Missouri – Columbia, J.D

Missouri Environmental Law & Policy Review

Order of Barristers

Professional Associations

American Bar Association

Law Practice Management Section

Missouri Bar Association

Federal Practice Subcommittee

Lawyer Referral Service Committee

Missouri Association of Trial Attorneys

Emergency Disaster Response Team

National Employment Law Association

Boone County Bar Association

Partners in Education Committee

Secretary (2009-2010)